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10 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee, for the C-BASS Mortgage*  
11 *Loan Asset-Backed Certificates, Series 2007-CB3*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 U.S. BANK NATIONAL ASSOCIATION, AS  
15 TRUSTEE, FOR THE C-BASS MORTGAGE  
16 LOAN ASSET-BACKED CERTIFICATES,  
17 SERIES 2007-CB3,

18 Plaintiff,

19 vs.

20 SATICOY BAY LLC SERIES 1105  
21 SULPHUR SPRINGS LANE; ROCK  
22 SPRINGS VISTA 3 HOMEOWNERS  
23 ASSOCIATION; HAMPTON & HAMPTON  
24 COLLECTIONS, LLC,

25 Defendants.

Case No.: 2:17-CV-01524-RFB-VCF

**STIPULATION AND ORDER TO  
EXTEND DISPOSITIVE MOTION  
DEADLINES**

**[FIRST REQUEST]**

26 Plaintiff, U.S. Bank National Association, as Trustee, for the C-BASS Mortgage Loan  
27 Asset-Backed Certificates, Series 2007-CB3 (hereinafter “Plaintiff” or “U.S. Bank”),  
28 Defendant, Saticoy Bay, LLC Series 1105 Sulphur Springs Lane (“Saticoy Bay” or  
“Defendant”) and Defendant, Rock Springs Vista 3 Homeowners Association (“Rock Springs”  
or “HOA”) (collectively, “the Parties”), by and through their attorneys of record, being the only  
parties participating in this action, hereby stipulate and agree to extend the dispositive motion  
deadline pursuant to Local Rules IA 6-1 and 26-4, as follows:

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1 This matter involves a non-judicial HOA lien foreclosure and the Nevada Supreme  
2 Court decision in SFR Investments Pool 1 v. U.S. Bank, 130 Nev. Adv. Op. 75, 334 P.3d 408  
3 (2014), which puts the deed of trust at issue into question.

4 The parties request to extend the dispositive motion deadline, set via the Court's Minute  
5 Order on April 9, 2019 [ECF No. 20], for the limited purpose of generating deposition  
6 transcripts necessary for a complete record and in support of the Parties' Motions for Summary  
7 Judgment. On April 9, 2019 the Court granted Saticoy Bay's Motion to Lift Stay, and set the  
8 following briefing schedule for dispositive motions: dispositive motions shall be filed by May  
9 14, 2019; responses shall be filed by May 23, 2019; and replies are to be filed by May 30, 2019.  
10 On April 9, 2019 the Parties had not yet conducted discovery regarding this case. Nonetheless,  
11 the Court made it clear that the Parties were to complete all discovery no later than May 7,  
12 2019.

13 The Parties participated in expedited discovery to complete any remaining issues.  
14 However, several of the key deposition transcripts have not yet been provided by the Court  
15 Reporter to the Parties. This includes the deposition transcripts of both the HOA and the HOA's  
16 foreclosure trustee, Hampton & Hampton Collections, LLC. Thus, the Parties request a ten-day  
17 extension of the current dispositive motion deadlines to ensure a complete and accurate record.

18 Subject to approval of the Court, the parties stipulate and agree to the following  
19 dispositive motion briefing schedule:

- 20 a. Dispositive motion deadline: May 23, 2019
- 21 b. Response deadline: May 31, 2019
- 22 c. Reply deadline: June 6, 2019

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1 The Parties respectfully submit that good cause exists for such extension and that this  
2 request is not brought for any improper purpose or for purposes of delay.

3 Dated this 14<sup>th</sup> day of May, 2019.

Dated this 14<sup>th</sup> day of May, 2019.

4 WRIGHT, FINLAY & ZAK, LLP

TYSON & MENDES

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/s/ Margaret E. Schmidt, Esq.

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11 *Mortgage Loan Asset-Backed Certificates,  
Series 2007-CB3*

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*Attorney for Defendant, Rock Springs Vista 3  
Homeowners Association*

12 Dated this 14<sup>th</sup> day of May, 2019.

13  
14 LAW OFFICE OF MICHAEL F. BOHN,  
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16 /s/ Michael F. Bohn, Esq.

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25 Sulphur Springs Lane*

26 **IT IS SO ORDERED.**



27 UNITED STATES MAGISTRATE JUDGE

28 May 15, 2019

DATED: \_\_\_\_\_